

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF LOUISVILLE GAS AND ELECTRIC)	
COMPANY FOR CERTIFICATES OF PUBLIC)	
CONVENIENCE AND NECESSITY AND APPROVAL)	CASE NO.
OF ITS 2016 COMPLIANCE PLAN FOR RECOVERY)	2016-00027
BY ENVIRONMENTAL SURCHARGE)	

COMMISSION STAFF'S REQUEST FOR INFORMATION TO
KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.

Kentucky Industrial Utility Customers, Inc. ("KIUC"), pursuant to 807 KAR 5:001, is to file with the Commission an original in paper medium and an electronic version of the following information. The information requested herein is due on or before June 1, 2016. Responses to requests for information in paper medium shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

KIUC shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which KIUC fails or

refuses to furnish all or part of the requested information, KIUC shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, KIUC shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Direct Testimony of Lane Kollen (“Kollen Testimony”), page 4, lines 17–19, which state, “KU proposes to commence the impoundment closure projects and construction of the new process water system at Trimble County in 2017 and complete all work by 2023.” Confirm that the reference in Kollen Testimony, page 4, line 17, is to Louisville Gas & Electric Company (“LG&E”), and not KU.

2. Refer to the Kollen Testimony, page 14, line 21, through page 16, line 9, and Exhibit LK-6. Provide an ECR – Gross-up Revenue Factor & Composite Income Tax Calculation using the format and calculations contained in Exhibit LK-6, but include the Internal Revenue Code §199 manufacturing tax deduction for LG&E.

DATED **MAY 18 2016**

cc: Parties of Record



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